

Lennox S. Hinds, Esq. (NY Bar 8196)
STEVENS, HINDS & WHITE, PC
116 West 111th Street
New York, NY 10026-4026
Telephone: (212) 864-4445
Facsimile: (212) 222-2680
lawfirmshw@yahoo.com

Counsel for Plaintiff Sherrie Russell-Brown

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

-----X	:	
SHERRIE RUSSELL-BROWN,	:	
	:	
Plaintiff,	:	Civil Action No. 2:10-cv-04017-SDW-MCA
v.	:	
	:	
THE UNIVERSITY OF FLORIDA,	:	<u>RETURN OF SERVICE EXECUTED</u>
BOARD OF TRUSTEES,	:	
THE UNIVERSITY OF FLORIDA,	:	
LEVIN COLLEGE OF LAW,	:	
ROBERT H. JERRY, II, in his	:	
individual and official capacities as	:	
Dean of the University of Florida,	:	
Levin College of Law, THE	:	
UNIVERSITY OF OXFORD and	:	
OXFORD UNIVERSITY	:	
DEVELOPMENT (NORTH AMERICA),	:	
	:	
Defendants.	:	
-----X	:	

LENNOX S. HINDS hereby certifies and says:

1. I am a partner in the law firm of Stevens, Hinds & White, P.C., attorneys for Plaintiff Sherrie Russell-Brown in the above-captioned matter. I am personally familiar with the facts set forth herein.
2. On August 5, 2010, Ms. Russell-Brown filed a Complaint (Doc. 1) for declaratory,

injunctive and equitable relief, as well as monetary damages, to redress Defendants'¹ unlawful conduct, including their unlawful retaliation for Ms. Russell-Brown having engaged in and continuing to engage in protected activity, in violation of the Civil Rights Act of 1866, 42 U.S.C. § 1981 ("Section 1981"), Title IX of the Education Amendments of 1972, 20 U.S.C. §§ 1681 et seq. ("Title IX"), Title VI of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000d et seq. ("Title VI"), and the First, Fifth and Fourteenth Amendments to the U.S. Constitution pursuant to 42 U.S.C. § 1983.

3. Service of process of the Summons and Complaint upon Defendant the University of Oxford was effected by two methods. On August 13, 2010, service of process of the Summons and Complaint upon the University of Oxford was effected by delivering a copy of each by UPS, signature required, directly to its executive offices in the U.K. (Doc. 4). On August 24, 2010, service of process of the Summons and Complaint upon the University of Oxford was effected by delivering two copies of each by UPS, signature required, to CT Corporation, 1209 Orange Street, Wilmington, Delaware 19801, for directing to Oxford University Development (North America), Inc. (file # 2182294) ("Oxford NA") and Oxford University Press (file # 0791971) ("OUP"), as agents authorized by appointment or by law to receive service of process (Exhibit A).

4. On August 31, 2010, Ms. Russell-Brown filed an Amended Complaint (Doc. 7), adding new facts as well as a new defendant, Oxford NA.

5. On September 2, 2010, service of process of the Summons and Amended Complaint upon new Defendant Oxford NA was effected by delivering a copy of each by UPS, signature required, to CT Corporation, 1209 Orange Street, Wilmington, Delaware 19801, an agent authorized by appointment or by law to receive service of process (Exhibit B).

6. Service of process of the Amended Complaint upon Defendant the University of

¹ Jointly and severally, the University of Florida Board of Trustees ("UF"), the University of Florida, Levin College of Law ("the Law School"), Robert H. Jerry, II ("Jerry"), in his individual and official capacities as Dean of the Law School, and the University of Oxford ("University of Oxford").

Oxford was effected by three methods. On August 31, 2010, service of process of the Amended Complaint upon the University of Oxford was effected by electronically serving a copy to its attorneys, using the CM/ECF system. On September 2 and 3, 2010, service of process of the Amended Complaint upon the University of Oxford was effected, respectively, by delivering two copies by UPS, signature required, to CT Corporation, 1209 Orange Street, Wilmington, Delaware 19801, for directing to Oxford NA and OUP, as agents authorized by appointment or by law to receive service of process and by delivering a copy by UPS, signature required, directly to its executive offices in the U.K. (Exhibit C).

I hereby certify and declare, under penalty of perjury, under the laws of the United States of America that the foregoing information contained in the Return of Service is true and correct.

s/ Lennox S. Hinds
Lennox S. Hinds, Esq.
New York Bar No. 8196
Stevens, Hinds & White, PC
116 West 111th Street
New York, NY 10026-4206
(212) 864-4445
(212) 222-2680 (fax)
lawfirmshw@yahoo.com

Executed on: September 3, 2010
New York, New York

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on September 3, 2010, the foregoing has been filed with the Clerk of the Court and served electronically by using the CM/ECF system, upon the following:

Zoe Eva Jasper, Esq.
Satterlee Stephens Burke & Burke, LLP
33 Wood Avenue South
Iselin, NJ 08830
212-818-9200
zjasper@ssbb.com

Attorneys for Defendant the University of Oxford

s/ Lennox S. Hinds
Lennox S. Hinds, Esq.
Attorney for Plaintiff

EXHIBIT A

Stevens, Hinds & White, P.C.

HOPE R. STEVENS (1904-1982)
JAVIER A. WHITE (1945-1987)
LENNOX S. HINDS *

ATTORNEYS AT LAW
116 WEST 111TH STREET
NEW YORK, NY 10026

NEW JERSEY OFFICE
42 VAN DOREN AVENUE
SOMERSET, NJ 08873
(732) 873-3096

Of-Counsel:
JULIETTE CHINAUD
GNOLEBA R. SERI *
DIDIER SEPHO

TEL: (212) 864-4445
FAX: (212) 222-2680
E-MAIL: lawfirmshw@yahoo.com

PARIS OFFICE
27, AVENUE DE L'OPERA
75001 PARIS

Also in
* New Jersey
* Paris

August 23, 2010

BY UPS (signature required)

CT Corporation
1209 Orange Street
Wilmington, Delaware 19801

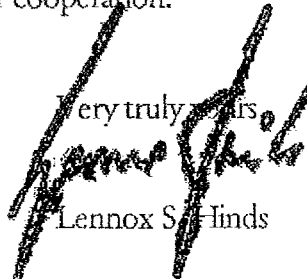
Re: *Russell-Brown v. The University of Florida Board of Trustees et al.*, No. 10-cv-04017-SDW-MCA

Dear CT Corporation:

I am in receipt of Ms. Baccellieri's August 12, 2010 letter, log # 517101834, returning the August 11, 2010 Letter, Summons and Complaint, regarding the above-referenced matter. In her letter, Ms. Baccellieri explained that the defendant, the University of Oxford ("Oxford") is not listed on your records or on the records of the State of Delaware.

I enclose, again, the Summons and Complaint for directing to Oxford University Development (North America), Inc. (file # 2182294) and Oxford University Press (file # 0791971), as agents for defendant Oxford. Both the Federal Rules of Civil Procedure and New Jersey law permit service of process upon a foreign corporation by serving an agent of the foreign corporation who is authorized by appointment or by law to receive it. See, e.g., *Volkswagenwerk AG v. Schlunk*, 486 U.S. 694, 708 (1987); *Dewey v. Volkswagen AG*, 558 F.Supp.2d 505, 513-15 (D.N.J. 2008).

Thanking you in advance for your cooperation.

Very truly yours,

Lennox S. Hinds

LSH/sbt

Enclosures



Proof of Delivery

Dear Customer,

This notice serves as proof of delivery for the shipment listed below.

Tracking Number: 1ZE6427W2210000360
Service: NEXT DAY AIR
Delivered On: 08/24/2010 9:44 A.M.
Delivered To: WILMINGTON, DE, US
Signed By: GRIMES

Location: FRONT DESK

Thank you for giving us this opportunity to serve you.

Sincerely,

UPS

Tracking results provided by UPS: 08/24/2010 1:32 P.M. ET

EXHIBIT B

Stevens, Hinds & White, P.C.

HOPE R. STEVENS (1904-1982)
JAVIER A. WHITE (1945-1987)
LENNOX S. HINDS *

ATTORNEYS AT LAW
116 WEST 111TH STREET
NEW YORK, NY 10026

NEW JERSEY OFFICE
42 VAN DOREN AVENUE
SOMERSET, NJ 08873
(732) 873-3096

Of-Counsel:

JULIETTE CHINAUD
GNOLEBA R. SERI *
DIDIER SEPHO◇

TEL: (212) 864-4445
FAX: (212) 222-2680
E-MAIL: lawfirmshw@yahoo.com

PARIS OFFICE
27, AVENUE DE L'OPERA
75001 PARIS

Also in

* New Jersey
◇ Paris

September 1, 2010

BY UPS (signature required)

CT Corporation
1209 Orange Street
Wilmington, Delaware 19801

Re: *Russell-Brown v. The University of Florida Board of Trustees et al.*, No. 10-cv-04017-SDW-MCA

Dear CT Corporation:

I represent Plaintiff Sherrie Russell-Brown in the above-referenced matter.

Enclosed you will find a Summons and an Amended Complaint for service on Defendant Oxford University Development (North America), Inc. (file # 2182294). I also enclose two additional copies of the Amended Complaint for service on Defendant Oxford University Development (North America), Inc. (file # 2182294) and Oxford University Press (file # 0791971), as agents for Defendant the University of Oxford. Both the Federal Rules of Civil Procedure and New Jersey law permit service of process upon a foreign corporation by serving an agent of the foreign corporation who is authorized by appointment or by law to receive it. See, e.g., Volkswagenwerk AG v. Schlunk, 486 U.S. 694, 708 (1987); Dewey v. Volkswagen AG, 558 F.Supp.2d 505, 513-15 (D.N.J. 2008).

Thanking you in advance for your cooperation.

Very truly yours,


Lennox S. Hinds

LSH/sbt

Enclosures (1 Summons; 3 Amended Complaints)

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

SHERRIE RUSSELL-BROWN,
Plaintiff

V.

SUMMONS IN A CIVIL CASE

**THE UNIVERSITY OF FLORIDA BOARD OF
TRUSTEES, ET AL.,**
Defendant

CASE NUMBER: 2:10-CV-04017-SDW -MCA

TO: *(Name and address of Defendant):*

Oxford University Development (North America), Inc. (file# 2182294)
500 Fifth Avenue, 32nd Floor
New York, New York 10110

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States Agency, or an office or employee of the United States described in Fed. R. civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Lennox S. Hinds, Esq.
Stevens, Hinds & White, PC
116 West 111th Street
New York, NY 10026-4026

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

WILLIAM T. WALSH

CLERK



JACQUETTA BAKER

(By) DEPUTY CLERK

ISSUED ON ~~2010-08-09~~ 16:56:45.0, Clerk
USDC NJD



Proof of Delivery

Dear Customer,

This notice serves as proof of delivery for the shipment listed below.

Tracking Number:	1ZE6427W2210000379
Service:	NEXT DAY AIR
Delivered On:	09/02/2010 9:22 A.M.
Delivered To:	WILMINGTON, DE, US
Signed By:	GRIMES

Location: FRONT DESK

Thank you for giving us this opportunity to serve you.

Sincerely,

UPS

Tracking results provided by UPS: 09/02/2010 2:35 P.M. ET

EXHIBIT C

Stevens, Hinds & White, P.C.

HOPE R. STEVENS (1904-1982)
JAVIER A. WHITE (1945-1987)
LENNOX S. HINDS *

ATTORNEYS AT LAW
116 WEST 111TH STREET
NEW YORK, NY 10026

NEW JERSEY OFFICE
42 VAN DOREN AVENUE
SOMERSET, NJ 08873
(732) 873-3096

Of-Counsel:
JULIETTE CHINAUD
GNOLEBA R. SERI *
DIDIER SEPHOO

TEL: (212) 864-4445
FAX: (212) 222-2680
E-MAIL: lawfirmshw@yahoo.com

PARIS OFFICE
27, AVENUE DE L'OPERA
75001 PARIS

Also in
* New Jersey
◇ Paris

September 1, 2010

BY UPS (signature required)

CT Corporation
1209 Orange Street
Wilmington, Delaware 19801

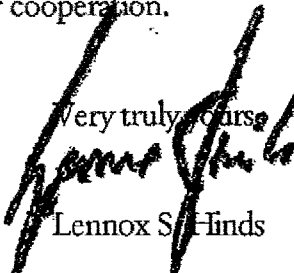
Re: *Russell-Brown v. The University of Florida Board of Trustees et al.*, No. 10-cv-04017-SDW-
MCA

Dear CT Corporation:

I represent Plaintiff Sherrie Russell-Brown in the above-referenced matter.

Enclosed you will find a Summons and an Amended Complaint for service on Defendant Oxford University Development (North America), Inc. (file # 2182294). I also enclose two additional copies of the Amended Complaint for service on Defendant Oxford University Development (North America), Inc. (file # 2182294) and Oxford University Press (file # 0791971), as agents for Defendant the University of Oxford. Both the Federal Rules of Civil Procedure and New Jersey law permit service of process upon a foreign corporation by serving an agent of the foreign corporation who is authorized by appointment or by law to receive it. See, e.g., Volkswagenwerk AG v. Schlunk, 486 U.S. 694, 708 (1987); Dewey v. Volkswagen AG, 558 F.Supp.2d 505, 513-15 (D.N.J. 2008).

Thanking you in advance for your cooperation.

Very truly yours,

Lennox S. Hinds

LSH/sbt

Enclosures (1 Summons; 3 Amended Complaints)



Proof of Delivery

Dear Customer,

This notice serves as proof of delivery for the shipment listed below.

Tracking Number:	1ZE6427W2210000379
Service:	NEXT DAY AIR
Delivered On:	09/02/2010 9:22 A.M.
Delivered To:	WILMINGTON, DE, US
Signed By:	GRIMES

Location: FRONT DESK

Thank you for giving us this opportunity to serve you.

Sincerely,

UPS

Tracking results provided by UPS: 09/02/2010 3:07 P.M. ET

Stevens, Hinds & White, P.C.

HOPE R. STEVENS (1904-1982)
JAVIER A. WHITE (1945-1987)
LENNOX S. HINDS *

ATTORNEYS AT LAW
116 WEST 111TH STREET
NEW YORK, NY 10026

NEW JERSEY OFFICE
42 VAN DOREN AVENUE
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Of-Counsel:
JULIETTE CHINAUD
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E-MAIL: lawfirmshw@yahoo.com

PARIS OFFICE
27, AVENUE DE L'OPERA
75001 PARIS

Also in
* New Jersey
◇ Paris

September 1, 2010

BY UPS (signature required)

Andrew D. Hamilton
Vice-Chancellor's Office
UNIVERSITY OF OXFORD
University Offices
Wellington Square
Oxford, UK
OX1 2JD

Re: *Russell-Brown v. The University of Florida Board of Trustees et al.*, No. 10-cv-04017-SDW-MCA

Dear Dr. Hamilton:

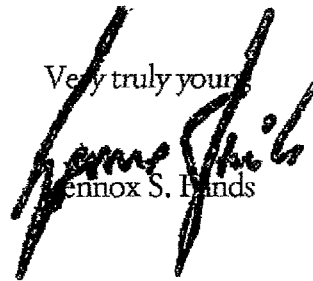
I represent Plaintiff Sherrie Russell-Brown in the above-referenced matter. Enclosed you will find an Amended Complaint filed against Defendant the University of Oxford, August 31, 2010, in the United States District Court, District of New Jersey.

Again, in terms of service of the Amended Complaint upon the University of Oxford by mail, Article 10(a) of the Hague Service Convention of 15 November 1965 on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters ("Hague Service Convention") specifically permits service of process upon the University of Oxford by mail, unless the U.K. has objected to this method. The U.K. has no objection to Article 10(a) of the Hague Service Convention.¹ See, e.g., *EOI v. Medical Marketing Ltd.*, 172 F.R.D. 133, 140-41 (D.N.J. 1997) (service of process by mail, in the U.K., satisfies Hague Service Convention); see also, *Eli Lilly v. Roussel Corp.*, 23 F.Supp.2d 460, 471-74 (D.N.J. 1998) (service of process by mail, in Italy and France, satisfies Hague Service Convention); *Rogers v. Kasahara*, No. 06-2033 (PGS), 2006 WL 6312904, at * 4-5 (D.N.J. October 16, 2006) (service of process by mail, in Japan, satisfies Hague Service Convention).

¹ See http://www.hcch.net/index_en.php?act=authorities.details&aid=278 ("Article 10(a): No opposition").

Thanking you in advance for your cooperation.

Very truly yours,



Pennox S. Bands

LSH/sbt

Enclosure (1 Amended Complaint)



Proof of Delivery

Dear Customer,

This notice serves as proof of delivery for the shipment listed below.

Tracking Number:	H5507355558
Service:	EXPRESS
Weight:	.50 Lb
Shipped/Billed On:	09/01/2010
Delivered On:	09/03/2010 10:26 A.M.
Delivered To:	OXFORD, GB
Signed By:	HORNER

Location: RECEPTION

Thank you for giving us this opportunity to serve you.

Sincerely,

UPS

Tracking results provided by UPS: 09/03/2010 6:59 A.M. ET